

EXHIBIT F

From: Kevin Jang <kevinjang@quinnemanuel.com>
Sent: Friday, July 28, 2023 5:00 PM
To: Grant Schmidt <gschmidt@hilgersgraben.com>; Jon Hyland <jhyland@hilgersgraben.com>; Theo Kwong <tkwong@hilgersgraben.com>
Cc: Lance Yang <lanceyang@quinnemanuel.com>
Subject: 2:22-CV-00422: Google's response to subpoena

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Counsel:

In response to Samsung's April 28, 2023 subpoena in Case No. 2:22-CV-00422 (EDTX), Google serves its document production in the link below:

Secure Delivery

The following file(s) have been sent to you from kevinjang@quinnemanuel.com. To download, please click on the following link.

[Click here to download the file\(s\) listed below](#)

PROD001_GOOG-HEADWATER-000000001.zip 11.45 MB

If the link above does not open, please copy and paste the following URL into your browser:
<https://sendfile.quinnemanuel.com/pkg?token=4dbfae99-78ab-480c-8d02-e80a2b53d151>

The secure message expires on 8/4/23 2:56:38 PM

Password to download will follow in a separate email.

In addition, Google is ready to provide source code designated CONFIDENTIAL – OUTSIDE ATTORNEYS’ EYES ONLY – SOURCE CODE for inspection as well. But Google has one concern with the terms of the current Protective Order (Dkt. 55) that it would like addressed before the source code is made available. Specifically, Section 23 of the Protective Order, which governs disposition following the final termination of the case, allows a receiving party to maintain pleadings, expert reports, and other documents containing “any Protected Material” for archival purposes. Google has a substantial concern with copies of its confidential and proprietary source code remaining in existence after the final termination of the case. Google believes this can be remedied if the archival purpose exception is limited to “Protected Material other than the materials designated CONFIDENTIAL – OUTSIDE ATTORNEYS’ EYES ONLY – SOURCE CODE or any materials which contain materials designated CONFIDENTIAL – OUTSIDE ATTORNEYS’ EYES ONLY – SOURCE CODE.” Please let us know if Samsung and Headwater are amenable to amend the Protective Order. Google will make available this code promptly after the Protective Order is amended.

Regards,
Kevin Jang

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